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May 24, 2016

VIA, ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: ● Lily Solar LLC vs. South Carolina Electric & Gas Company
● 2016-89-E
● **Motion to Amend**

Dear Ms. Boyd:

Enclosed for filing, please find Lily Solar LLC's Motion to Amend, with Exhibit "A", Cover Sheet and Certificate of Service. Please notify the undersigned if you there is anything else you may need.

Respectfully Submitted,

/S/ _____
Richard L. Whitt

RLW/cas

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2016-89-E**

IN RE:)	
Lily Solar LLC,)	
)	
Complainant/Petitioner,)	
vs.)	MOTION TO AMEND
)	
South Carolina Electric & Gas Company,)	
)	
Defendant/Respondent.)	
_____)	

INTRODUCTION

Lily Solar LLC's, (hereinafter as, "Lily Solar") Complaint is denominated hereinabove and currently pending before this Commission. Defendant/Respondent complains that Lily Solar should have attached its Exhibits¹ to Lily Solar's Complaint, instead of, as was done in Lily Solar's Complaint, referencing the electronic mail and documents as Exhibits in paragraph "10", of Lily Solar's Complaint. Lily Solar is adding the Exhibits for the convenience of the Commission, and not because it was required to attach the Exhibits to its Complaint. Lily Solar was only required to plead the facts to be proved at trial and Lily Solar was not required to plead the evidence. Lily Solar hereby moves to amend its Complaint, pursuant to R. 103-828 of the Commission's Regulations and Rule 15(a), South Carolina Rules of Civil Procedure, as follows.

MOTION TO AMEND

Lily Solar hereby moves to amend its currently pending Complaint, by adding the Exhibits specifically referenced in paragraph "10" of Lily Solar's Complaint, (see, Exhibit "A" attached hereto).

¹ Lily Solar's Complaint Exhibits, specifically referenced in paragraph "10", of Lily Solar's Complaint, are described in Exhibit "A" attached hereto.

South Carolina strongly favors amendments and amendments should be freely granted. Furthermore, Lily Solar's request does not violate this Commission's Rule on amendments, R. 103-828, because Lily Solar's Motion is not filed within ten days of the commencement of a Hearing².

CONCLUSION

Based on the foregoing, this Commission should allow Lily Solar to amend its Complaint, currently pending before this Commission, to add the Exhibits as described on Exhibit "A" attached hereto.

Respectfully Submitted,

/S/

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Attorney for Lily Solar LLC

May 24, 2016
Columbia, South Carolina

² The Hearing in this matter is not scheduled until **August 10, 2016**.

EXHIBIT “A”

- E-Mail from SCE&G to Lily Solar, dated January 27, 2015.
- E-Mail from SCE&G to Lily Solar, dated June 22, 2015.
- E-Mail from SCE&G to Lily Solar, dated January 14, 2016.
- E-Mail from SCE&G to Lily Solar, dated January 22, 2016.
- SCE&G document, “Appendix 3 to LGIP Interconnection System Impact Study Agreement, dated March 23, 2015”.
- SCE&G document, “Appendix 4 to LGIP Interconnection Facilities Study Agreement, dated July 22, 2015”.

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2016-89-E**

IN RE:)
Lily Solar LLC,)
)
Complainant/Petitioner,)
vs.)
South Carolina Electric & Gas Company,)
)
Defendant/Respondent.)
_____)

CERTIFICATE OF SERVICE

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I have served copies of the Cover Sheet, Lily Solar LLC's Motion to Amend, with Exhibit "A" and this Certificate of Service, as indicated below, via electronic mail on May 24, 2016.

K. Chad Burgess
Email: chad.burgess@scana.com

/S/ _____
Carrie A. Schurg

May 24, 2016
Columbia, South Carolina